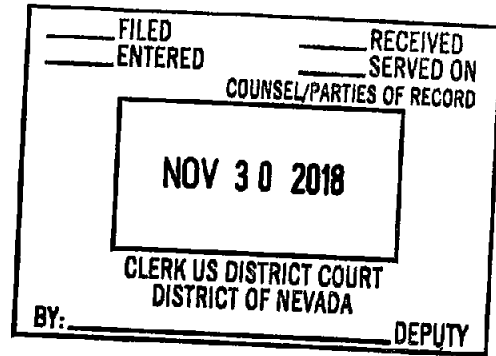


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UNITED STATES I
THE DISTRI

2:18-cv-02289-RFB-NJK

Kelly Innsbruck Alexander
Plaintiff

vs.

Nevada Secretary of State
Barbara G. Cegavske, Lenora
Mueller, Russell Ricciardelli,
Edward D. Kania, and

DOES 1-50

Defendants

STATE OF NEVADA,

Necessary party

Jury Trial: YES ☒ NO

COMPLAINT FOR
DECLARATORY AND
PRELIMINARY AND
PERMANENT INJUNCTIVE
RELIEF

COMPLAINT FOR DAMAGES:
A. CIVIL CONSPIRACY

B. CIVIL RIGHTS/
CONSTITUTIONAL VIOLATIONS

- (1) Right to contract (Article I §10; 1st Amendment)
- (2) Denial of Due Process (5th Amendment)
- (3) Illegal Seizure (4th Amendment)
- (4) Involuntary Servitude (13th Amendment)

I. OVERVIEW OF THE ACTION

Comes now Plaintiff, Kelly Innsbruck Alexander, hereinafter Plaintiff, to seek declaratory relief against the Nevada Secretary of State, Barbara G. Cegvaske, hereinafter Secretary of State or SoS, Lenora Mueller, hereinafter Mueller, Russell Ricciardelli,

IV. CAUSES OF ACTION RIPE FOR DECLARATORY RELIEF

Plaintiff complains and for causes of action alleges as follows:

A. FIRST CAUSE OF ACTION

(For Declaratory Relief Regarding Purpose of Office of Notaries)

13. Plaintiff incorporates by reference paragraphs 1 through 12 as if fully set forth herein.

14. Plaintiff alleges that an actual controversy has arisen and now exists between Plaintiff

and above-cited Defendants concerning their respective rights and duties in that

Plaintiff contends: (A) Plaintiff has a right to serve as a notary on behalf of all people

in the State of Nevada regardless of which chose in action the People elect; (B)

Plaintiff has the duty to treat parties who choose to settle commercial affairs in the

private venue with the same respect, integrity, and conscientiousness as those who

volunteer to operate in the public arena, (C) the mandate imbedded in the tenet behind

the opinion in *OK Corp v. Williams* 461 F. Supp. 540 requires all parties to a

controversy to attempt private settlement prior to seeking judicial review which

precludes the Secretary of the State of Nevada from (1) interfering with Plaintiff's

patrons' requests, and (2) unilaterally penalizing Plaintiff for assisting parties invoking

said tenet by assessing stiff monetary fines and stripping Plaintiff of the office of

notary public, and, (D) Defendants dispute these contentions and contend that: (a)

Plaintiff's performance can be controlled and chilled by the imposition of the rules and

laws of the public venue (State of Nevada) even when requested to perform notarial

functions for a party electing to settle commercial affairs in the private venue; (b)

1 Defendants have the authority to foray into the private venue and curtail/chill
2 Plaintiff's right to perform services which support the People in the state choosing the
3 private venue for the handling of their affairs, (c) Defendants were delegated rights
4 and duties by the People, which permit state actors to compel Plaintiff to refuse
5 services (in spite of the Notary Manual citing as the number one priority that notaries
6 may not refuse services authorized by the legislature in the Notary's Manual) which
7 Defendants determine as counterproductive or competitive with the State's ability to
8 generate income; (d) Defendants' authority supersedes all rights and powers of the
9 notary requested to perform duties for People who elect the private venue, including
10 the power to unilaterally assess fines and penalties and withhold the granting of the
11 office of notary (e) Defendants' powers extend to colluding to conspire to drive
12 Plaintiff out of office by using an unsworn 'note' of inquiry against Plaintiff by
13 denying Plaintiff a fair hearing or adhering to the administrative process identified in
14 the Online Notary Training Program; (f) Defendants may foray into the private venue
15 to (1) direct what is permissible in the private contracts consummated therein, and, (2)
16 obstruct Plaintiff's performance of lawful duties prescribed by the Notary Handbook
17 which delineate public functions, OR the Notary Manual prescribing private and/or
18 common law functions where the long arm of the State doesn't have authority;(g)
19 Defendants, through the use of threat, duress, and coercion, may exert public authority
20 not delegated to Defendant state actors if the interest of the Defendant State is at stake,
21 even if the purpose of the obstruction is to burn the bridge created naturally by the
22 office of the notary so that private judgments do not and cannot diminish the State's
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1 hereinafter RR, and Edward D. Kania, hereinafter 'attorney' or Kania, whose acts,
2 actions and/or omissions suggest disparate stances regarding the performance of Plaintiff
3 in the position of notary public.

4 Plaintiff not only considers the appointment a bridge between the public and
5 private venues, but also adjudges the appointment as conferring the same rights, duties,
6 obligations, benefits, and entitlements upon the recipient of said appointment as those to
7 which other beneficiaries are entitled. Defendants actions would have this Court believe
8 that a notary is restricted to operating only within the public venue, and limited to
9 performing only those acts which may or may not meet the approval of parties negatively
10 impacted by the notary's business, entitling and/or 'authorizing' Defendants to strip
11 Plaintiff of the appointment without hearing or opportunity to cure based on a mere letter
12 of inquiry from parties who have or believe they have 'friends in high places,' a
13 discriminatory premise to be sure. That notwithstanding, Defendants exemplify an
14 attitude of superiority over Plaintiff who was unilaterally stripped of the appointment
15 AFTER Defendants negotiated a payment of fines against Plaintiff, and in the absence of
16 probable cause which, had the laws been followed and/or the administrative process built
17 into every state agency been adhered to, would have revealed the letter of inquiry from
18 RR to SoS to be founded in retaliation and revenge against a patron whom Plaintiff
19 served in an attempt to collect evidence of RR's intent for a different federal action
20 pending in this same court. While the evidence indirectly impacted Defendant RR as to
21 RR's refusal to fire an employee later found by a U.S. Marshal to be on the Nevada Sex
22 Registry, the underlying issue involved Defendant Kania's involvement with influencing
23 a state court judge, a matter serious enough to prompt said 'attorney' to lash out for
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25

1 revenge and to use the office of the Nevada Secretary of State to achieve that goal. The
2 fact that SoS and Mueller by-passed the due process protocol stands as *prima facie*
3 evidence that a civil conspiracy had to promulgate the desired outcome.

4 When a state governmental agency acts as if there is no private venue, its actions and
5 those of its agents/state actors, in effect, compel performance in the public venue,
6 desecrating the very existence of the People who comprise the *raison d'être* of that very
7 government. Defendants SoS and Mueller acted under color of law outside their
8 delegated authority to deny Plaintiff the right to perform the duty of bridge between the
9 public and private in spite of the tenet in *OK Corp v. Williams*, 461 F. Supp 540, which,
10 by the very nature of the decision mandating all parties to attempt private settlement prior
11 to seeking judicial review, indicates the separate venues. By proceeding as if there were
12 no private venue in which Plaintiff could assist in obtaining such private settlements,
13 Defendants, and all of them, establish a subservient station for Plaintiff against Plaintiff's
14 will. The resultant oppression penalized Plaintiff for contracting in the private venue and
15 deprived Plaintiff of the opportunity to continue to serve in a chosen venue which is an
16 attack on the People of the state of Nevada, and the People of this republic as a whole.
17 The ensuing silence from Sos and Mueller has continued since December of 2017 which
18 must be construed as Defendants holding firm to their position in spite of the refusal to
19 produce any legal basis when provided with an opportunity to cure. This action serves to
20 determine the exact nature and basis for Defendant's unsubstantiated/untenable
21 viewpoint.
22

23 Plaintiff attended the required online class for the renewal of Plaintiff's appointment
24 on or about April 20, AD2018, and tendered a money order to cover the fees associated
25

1 with obtaining the notary stamp without which Plaintiff cannot proceed to perform the
2 duties of a notary. Public records reflect the money order was negotiated in favor of the
3 payee, ergo, State of Nevada Secretary of State on or about July 17, AD2018 yet SoS has
4 withheld the issuance of the authorization for the renewal of Plaintiff's appointment and
5 notarial stamp, effectively chilling Plaintiff's ability to serve the People. Hence,
6 preliminary and permanent injunctive relief is sought in the nature of a Writ of
7 Mandamus/Prohibition, ordering SoS to stop withholding the certificate authorizing the
8 acquisition of the stamp, in effect, ordering SoS to issue the authorization to Plaintiff.
9 Plaintiff also seeks relief enjoining SoS from maintaining an inaccurate record which
10 intimates Plaintiff committed some act worthy of suspension, revocation, and/or
11 cancellation of the appointment when no formal or official determination has been made
12 through the proper channels established within the agency. This is an action at law and in
13 equity, and is designed to prohibit the State of Nevada's direct encroachment upon the
14 sovereignty of the People of the State and the United States of America assured under the
15 Ninth Amendment to the United States Constitution, not to mention defying the very
16 well-established holding [*OK Corp, ibid.*] of the U.S. District Fifth Circuit Court.
17 Therefore, the most precarious issue raised herein is the refusal/failure to recognize the
18 private venue and the freedoms of the People, upon which the entire government is based.
19

20 II. JURISDICTION

- 21
- 22 1. This matter is a declaratory judgment action pursuant to 28 U.S.C. §2201 and §2202
23 which provides for a determination of the rights and duties of each party based upon
24 an agreement through the compact permitting statehood, to appoint notaries to perform
25 duties within the State and within the state, ergo, for the people and for the public.

1 [For purposes of this suit, ‘public’ is defined as “the entire body politic.”] Under 42
2 U.S.C. § 1983, Plaintiff sues state officials acting under color of law for the
3 “deprivation of rights, privileges, or immunities secured by the Constitution under the
4 First, Fourth, Fifth, and Thirteenth Articles in Amendment, as well as the clause
5 preserving the right to contract without government interference, as prescribed at
6 Article I § 10. Plaintiff is entitled to relief because the facts demonstrate that a
7 genuine federal question is raised herein.

8 2. Plaintiff invokes 5 USC § 552(f)(5) to establish Defendants’ duty to maintain an
9 accurate record and to correct the inaccurate record upon request.

10 3. This matter is not an interlocutory appeal challenging an administrative decision for
11 no proceeding was conducted, at least not one in public, under the data integrity board
12 process, or of which Plaintiff was notified, in spite of the mandate for Defendant SoS
13 to do so (this mandate was emphasized by the instruction presented at the online
14 training class Plaintiff attended). This action is a request for the third branch of the
15 federal government to exercise its authority when a state cannot or will not respect the
16 rights of the People in the private venue, and is authorized under the undeniable,
17 fundamental principle of law wherein jurisdiction may be raised at any time in any
18 forum. Preliminary and permanent injunction is therefore authorized when a state
19 with a vested interest holds firm to an unconstitutional denial of rights. The Nevada
20 Constitution does not bestow upon the State unlimited or expandable powers upon the
21 agencies within the framework of a ‘government of the people, by the people, and for
22 the people.’ It delegates limited powers and is designed to control the reach of the
23 State even in its equal sovereignty with the People so the people will not be subjugated
24 to the arbitrary, capricious, and unlawful exercise of illegal authority. This is
25 particularly significant when government agents pick up the banner of an adverse

1 party and conspires in the absence of due process, to injure the other party, ergo,
2 Plaintiff.

3 Absent this immediate judicial determination, Plaintiff and the People of the State of
4 Nevada, and the People of the United States of America will continue to suffer
5 irreparable harm through the deprivation of the right to obtain a judgment in the private
6 venue when adherence to the mandate 'all parties must attempt private administrative
7 remedy PRIOR to seeking judicial review' is **obstructed or annihilated**. The continued
8 acts of Defendants will destroy the will and rights of the People via compelling the
9 People to utilize the statutory courts to obtain judgments, and the involuntary compliance
10 can have no other effect than to open the door to government intrusion as if the People
11 had no will or rights. If the court in *OK Corp v Williams*, 461 F. Supp 540, did not
12 intend for the People to have a remedy in the private venue, there would not be signs
13 posted in small claims courts mandating the parties to 'talk it out in the hall' and judges
14 would **not hesitate to** grant courtrooms to anyone and everyone who thought they had a
15 case. Judges would not require the parties to 'step outside the courtroom' to discuss
16 settlement and mediation centers would be required to discuss the matter violating all
17 rights to privacy. If there were no bridge between the public and private, government
18 agents would have free reign over all activities of all people and there would be no
19 freedom from tyranny. If the court that opined "everyone must attempt private settlement
20 prior to seeking judicial review' did not recognize or acknowledge the existence of the
21 private venue, there would be no need for such an opinion. And, if there were no bridge
22 to bring judgments from outside venues into the public for ratification or
23 acknowledgment, there would be no statutes authorizing courts to re-cognize foreign
24 judgments. Preventing the People from obtaining private evidence **of deliberate**
25 **dishonors** and/or **res judicata** judgments without the use of state courts or attorneys

1 would usurp the power of the people as the governing authority and must be deemed as
 2 foraying from the public venue into the private to 'invade' the rights of the people
 3 guaranteed to be secure in their homes and commercial affairs, making the People
 4 involuntary servants subject to government fancies, whims, and dictates. The ruse of
 5 withholding the re-authorization to obtain the notary stamp after accepting payment for
 6 the appointment suggests the subtlety of the overall goal of suppression and oppression
 7 implemented by Defendants, since honest public servants do not resort to deceit or
 8 trickery to conform to the law. Assumption of jurisdiction is an urgent matter if this
 9 Court is to intervene to enjoin Defendants from destroying the sovereignty of the People
 10 who are entitled to petition for redress in any venue, as delineated in the chose in action
 11 doctrine honored by honest officials. Plaintiff is entitled to relief because the facts
 12 demonstrate that a genuine federal question is raised herein.

13 III. PARTIES

- 14 4. Plaintiff, Kelly Innsbruck Alexander, is and at all times herein mentioned, an
 15 inhabitant of the State of Nevada, and maintains a viable mailing address at 5130 S.
 16 Ft. Apache Rd., #215-262, Las Vegas, Nevada, 89148, who, until recently, served as a
 17 notary public from August 1st of 2010 until August 1st of 2018 when Defendants
 18 conspired to deprive Plaintiff of that office without notice.
 19
- 20 5. State of Nevada Secretary of State is an instrumentality of the State of Nevada, and
 21 may be sued independently since it is not encompassed as a "person", "partnership",
 22 or "corporation" as defined by the Federal Trade Commission (FTC) Act. It is also
 23 not an "association" nor a 'for profit' or non-profit corporation; but for the State of
 24 Nevada, the office of SoS would not exist. Therefore, Plaintiff believes and alleges
 25

1 that the office was created by statute and operates outside the constant scrutiny and/or
2 supervision of other officials holding office within the state. The address of the office
3 is State Capital Building, 101 N. Carson Street, Suite 3, Carson City, NV 89701. The
4 STATE OF NEVADA is included as a necessary party who employs other
5 Defendants.

6 6. Barbara G. Cegavske is the current elected Secretary of State and is sued herein in her
7 private individual capacity, and is a resident of the State of Nevada, whose address is
8 also State Capital Building, 101 N. Carson Street, Suite 3, Carson City, NV 89701.
9 The STATE OF NEVADA is included as a necessary party to determine if STATE
10 authorized or colluded with other Defendants who acted in official capacity.

11 7. Lenora Mueller is an administrator within the notary division of the Secretary of
12 State's Office and is sued herein in her private individual capacity, and is authorized to
13 assess, evaluate, and assign fault for violations of notary practices, including but not
14 limited to suspension, revocations, and cancellations of the appointments of notaries.
15 Mueller is a resident of the State of Nevada whose office address is State Capital
16 Building, 101 N. Carson Street, Suite 3, Carson City, NV 89701. The STATE OF
17 NEVADA is included as the employer of Mueller.

18 8. Russell Ricciardelli is a resident of the State of Nevada and a business owner
19 operating within Clark County, whose address is 9154 White Rock Peak Rd., Las
20 Vegas, NV 89113-6142, and who, out of retaliation challenged the actions of Plaintiff
21 in an act of retaliation for Plaintiff having sought to determine RR's intent regarding a
22 private settlement in an issue raised by Plaintiff's patron regarding wrongful eviction
23 for reporting sexual harassment and illegally influencing a state court 'judge'.
24
25

1 9. Edward D. Kania is a resident of the state of Nevada, a 'practicing' attorney under the
2 Bar Card # 8821, whose address is 106 S. 6th Street, Las Vegas, NV, 89101, and who
3 advised RR to file a second illegal action in an eviction action after an unfavorable
4 decision was made in a previous case (known as 'decision-shopping' by the Supreme
5 Court of Nevada in a case titled *Five Star Capital v Ruby*) in order to evict the patron
6 for whom Plaintiff sought the private judgment [pending Nevada Supreme Court case
7 # 75624.]

8 10. Plaintiff is ignorant of the true names and capacities of DOE DEFENDANTS who
9 may be identified at a later time, such as during discovery which may reveal
10 Defendant SoS and/or Mueller were influenced by other parties to 'help' an outside
11 source (including but not limited to 'friends' of Defendants such as the judge unduly
12 influenced in the afore-mentioned USDC action) and/or advised by other officials
13 within the State of Nevada such as the Governor or Attorney General.
14

15 11. Plaintiff is informed and believes and thereon alleges that, at all times herein
16 mentioned, each of the defendants sued herein was the agent and/or employee and/or
17 associate of each of the remaining defendants and was at all times acting within the
18 purpose and scope of such agency and employment and/or association, for in the
19 absence of some bond, state actors are unlikely to act unilaterally and contrary to the
20 administrative procedures established within their state.
21

22 12. Plaintiff believes and herein alleges that Defendants acted in his or her personal
23 capacity via direct acts and actions or omissions, or through actions involving
24 sufficient causal connection between the act and the injury to Plaintiff.
25

1 coffers augmented by filing fees and court costs that are reduced by private
2 settlements.

3 **A1. DETERMINATION OF RIGHTS AND RESPONSIBILITIES**
4

5 15. Plaintiff incorporates by reference paragraphs 1 through 14 as if fully set forth herein.

6 16. This Honorable Court is asked to determine the rights and responsibilities of (A)

7 Plaintiff who exercises, for all of the People whether in the public or private venue, the
8 duties of a notary public according to the law, the Constitution, and the parameters of
9 the State of Nevada Notary Handbook as well as the Notary's Manual, *Ninth Edition*,
10 but who has been surreptitiously stripped through stealth and deception of the valued
11 **and** necessary office by Defendants who, under color of law, forayed into the private
12 venue and desecrated the functions of the office wherein the People have a remedy
13 against miscreant public government officials who disdain restrictions upon their
14 power, and the limited authority delegated to the State of Nevada and (B) Defendants
15 who forayed outside their realm of authority into the private venue to control, restrict,
16 limit, interfere with and/or obstruct the functioning of the private venue to oppress and
17 intimidate the People whom Defendants, as state actors, swore to preserve and protect,
18 by denying due process to Plaintiff, colluding to conspire with a disgruntled individual
19 who dishonored an attempt at private settlement upon the advice of an attorney who
20 had notice that interfering in the private venue would result in allegations of treason.
21 Defendants stripped Plaintiff of the office of notary which prevents the People from
22 obtaining private evidence and judgments against state actors who abuse their power
23 under color of law.
24
25

A2. FACTS

17. Plaintiff incorporates by reference paragraphs 1 through 16 as if fully set forth herein.

18. On or about June 10th, 2010, Plaintiff studied and applied for a notarial appointment for the office of notary in the State of Nevada.

19. Plaintiff dutifully served the People of the State of Nevada in both their public and private capacities until September 25, 2010 when Plaintiff, serving as a notary public was requested to collect evidence from then Secretary of State, Ross Miller as to his intent regarding private resolution over a private automobile offered as an asset for the State of Nevada in lieu of registration of said automobile. Plaintiff sought clarification regarding the purpose of notaries and the scope of the powers of the State to curtail duties legislatively authorized.

20. Hearing no objections from Ross Miller regarding Plaintiff's efforts to document and memorialize Ross Miller's response, Plaintiff then resumed providing personal knowledge of dishonors through the private protest process, doing nothing more than issuing Certificates of Protest to patrons after the intent of an opposing party became clear. Said certificates enabled Plaintiff to testify, if called upon, that the party dishonoring the opportunity to cure or settle the issue willingly and knowingly, did so intentionally, having refused three times to provide lawful and honorable response. Plaintiff's testimony would prevent any party from abusing or unnecessarily draining the courts resources which are made available to parties where a genuine controversy exists. Plaintiff's personal knowledge that an opposing party deliberately refused to negotiate and attempt private settlement, as mandated by law, is designed to create estoppels against parties whose intent is to use the threat and intimidation of a public

1 court action against an honorable party capable of stating a claim upon which relief
2 could be granted.

3 21. On or about November 16, AD2017, Plaintiff received a letter from the Secretary of
4 State of Nevada that found that Plaintiff was in violation of NRS 240.075 Prohibited
5 acts. #2, #3, #10, and #11 with unspecified allegations and basing said allegations on
6 RR's submission of Plaintiff's private communication delivered to RR at the request
7 of Plaintiff's patron seeking private settlement, titled "NOTICE OF PROTEST AND
8 OPPORTUNITY TO CURE" and should remit \$5200 in fines. Said letter was signed
9 by Lenora Mueller, Notary Administrator of the Notary Division, under the seal of the
10 SoS, Barbara G. Cegavske.

11 22. On or about November 30, AD2017, Plaintiff sent Lenora Mueller a Conditional
12 Acceptance, agreeing to accept the charges fully upon certain conditions labeled
13 'proofs of claim' being met.

14 23. In late June or early July of AD2018, Sean Haggarty, a notary public (not a party)
15 issued a Notice of Dishonor and Opportunity To Cure to Lenora Mueller for having
16 failed or refused to provide a response to Plaintiff's Conditional Acceptance that
17 sought the basis for the unilateral fines and the lawful or legal basis for the denial of
18 due process.

19 24. On or about December 19, AD2017, Plaintiff, who had no commercial energy to
20 proceed in the private settlement until issuance of a final Certificate of
21 Dishonor/Protest was issued, changed the issue to one of a FOIA request under
22 Nevada's Public Records Act, seeking copies of the documentation which formed the
23 basis for the penalties unilaterally assessed as well as the authority granting the right
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25

1 to a unilateral decision which determined that Plaintiff was not in compliance with
2 NRS 240 law or statute or that Plaintiff was prohibited from contracting in the private
3 venue.

4 25. On or about January 16, AD2018, SoS records division, in reply to Plaintiff's FOIA
5 request, mailed Plaintiff a copy of the letter of inquiry claimed to have been sent by
6 Russell Ricciardelli (RR), asking for an investigation of Plaintiff. The innocuous
7 contents were unsworn and simply read, "Please look into this complaint...based on
8 my belief that these documents are beyond the scope of a notary..."

9 26. Plaintiff filed a claim against SoS in order to exhaust all remedies, sending a coy to
10 Attorney General, Adam Laxalt, seeking damages for the denial of due process
11 exemplified by SoS's inexplicable circumvention of the State's administrative process
12 which required a fair and impartial hearing after an independent investigator collected
13 all available confidential commercial information to set before an administrative law
14 judge PRIOR to a determination that Plaintiff had violated any legal or lawful duty.
15

16 27. On or about July 20th, AD2018, Plaintiff received notification from the notary who
17 was requested to obtained personal knowledge that Mueller deliberately and willfully
18 ignored Plaintiff's attempt at private settlement, that Mueller had in fact elected
19 dishonor of Sean S Haggerty's initial NOTICE OF DISHONOR once again,
20 rendering Plaintiff's claim as ripe for a declaratory judgment action.
21

22 **A3. PLAINTIFF MOVES THE COURT:**

23 For a declaration that: Plaintiff incorporates by reference paragraphs 1 through 27 as if
24 fully set forth herein.
25

1 28. The People of the United States of America and The State of Nevada via the 1864
2 accord granting Nevada permission into the Union on October 31, 1864, are entitled
3 by natural right to obtain judgments in the private venue.

4 29. The People of the United States of America and The State of Nevada via the 1864
5 accord granting Nevada permission into the Union on October 31, 1864, are entitled
6 by natural right to obtain judgments in the private venue without subscribing to public
7 venue offers of courts and/or attorneys.

8 30. The People of the United States of America and The State of Nevada via the 1864
9 accord granting Nevada permission into the Union on October 31, 1864, are entitled
10 by natural right to obtain judgments in the private venue as substantiated in the court
11 ruling *OK Corp v Williams* 461 F. Supp 540, which mandates all parties attempt
12 private administrative process PRIOR to seeking judicial review.

13 31. The hierarchy of the law delineates the separation of the private venue from the public
14 venue, wherein the foundation of said hierarchy secures the most power and authority
15 and diminishes as the levels advance from 'natural law' to 'commercial law' to
16 'common law' to 'statutory law' until it secures the least power and authority at the
17 furthest level from the foundation referred to as 'political law.'

18 32. The private venue, recognized as closer to the foundation of all law (natural law which
19 cannot be altered by man), is more powerful than public venue law, formed
20 subsequently upon the foundation of private law.

21 33. The two venues are available to all People (defined as the government capable of
22 delegating to public servants the execution of the People's will) by choice.

23 34. No authority has ever been granted to any citizen (even ones delegated as public
24 servants) which authorizes compelling another living soul into either venue. The first
25

1 Thirteenth Article in Amendment prohibited titles of nobility (including but not
2 limited to Esquires) from operating in the private venue of the People.

3 35. The first Thirteenth Article in Amendment was **enhanced** in 1939, through the
4 Peonage Act, when Congress authorized titles of nobility to operate in the limited
5 capacity where corporate, ergo, dead fictional entities (incapable of speaking for
6 themselves) might state or defend a claim.

7 36. The divide between the private venue labeled Commercial Law, and the public venue,
8 labeled Statutory Law, can only be traversed by voluntary and explicit decisive action.

9 37. The private venue has no need of 'tools' or 'weapons' with which to compel a party
10 into the private venue since all People are endowed with natural rights.

11 38. The Nevada Secretary of State's Office (public venue) unlawfully uses trickery,
12 deceit, force, coercion, and threats which can be employed to compel People in the
13 private venue into the public venue against their will.

14 39. In the instant case, Mueller, **appears to have been** acting on behalf of the Secretary of
15 State of the State of Nevada, yet in an *ultra vires* action which requires matters of
16 controversy to proceed through an administrative law judge, refused to respond to an
17 attempt to settle this matter in the private venue, outside SoS's public title and
18 authority, by remaining silent to the Conditional Acceptance, as documented by the
19 Notice of Dishonor and Opportunity To Cure issued by a notary public on or about
20 July 15, AD2018, memorializing the silence of Mueller.

21 40. The chilling effect of the curtailing of Plaintiff's appointment to serve as a bridge
22 between the public and private venues substantiates that a public agent conspired with
23 an independent party to achieve the same goal, which comports with the definition of
24 conspiracy.

25

1 41. The People calling on Plaintiff to serve as a bridge between the public and the private
2 venues are patrons, defined as "one who supports or protects; an advocate or pleader."

3 42. Plaintiff's patrons are not customers, which are defined as "a buyer, purchaser, or
4 receiver of goods or services; a person who receives help or advice from a
5 professional" which does not comport with asking the notary to initiate a protest
6 process by first obtaining the all-important personal knowledge of the facts which the
7 notary is requested to take into the public venue.

8 43. A notary who obtains personal knowledge of a dishonor of a private instrument and/or
9 counter-offer in the private venue carries the weight of two witnesses due to the
10 special office granted through the notary appointment, making such testimony of the
11 notary irrefutable.

12 44. A notary who is requested by one of the People to obtain personal knowledge of a
13 dishonor of an instrument or offer in the private venue is not seeking advice or
14 receiving help with the commercial affairs of said party (one of the People), rendering
15 the party a patron, not a 'customer' over whom a public official such as Mueller or the
16 SoS, may exert authority.

17 45. Rendering the testimony of a party's dishonor 'irrefutable' by a notary constitutes a
18 'judgment' since it cannot be controverted, in the absence of defects.

19 46. Nevada's Secretary of State deplors private judgments because (A) the state courts
20 are deprived of filing fees and numerous litigation costs, and, (B) state officials lose
21 their secret weapon of 'ignorance' routinely used by government agents who do not
22 want transparency of the remedy notaries provide to the People when agents/officials
23 dishonor People seeking remedy via memorialization of their silence or argument.

24 47. If Defendants successfully bar the private judgment obtained by Plaintiff's patrons,
25 which permit the People to avoid attorneys and courts by controlling the acts in the

1 private venue through curtailing the right of Plaintiff to issue private judgments, the
2 State of Nevada will avoid accountability for millions of dollars in tort and civil rights
3 awards by defrauding the People of legitimate claims because notaries were/are being
4 prevented from collecting and bringing evidence against errant state actors into the
5 public arena under the rules governing foreign judgments.

6 48. The deprivation and/or desecration of the right of the People to obtain judgments in
7 the private venue constitutes 'mixed war' which is defined as government agents
8 fighting and destroying the People and the common law upon which statutory law is
9 predicated.

10 49. 'Mixed war' is a treasonous act because, by destroying the rights of the People to
11 effectuate remedies against rogue public servants, those engaged in 'mixed war'
12 benefit via oppression of the very assets said servants are delegated to protect and
13 serve, resulting in tyranny.

14 50. Nevada's Secretary of State's obstruction and interference with Plaintiff's duty to
15 obtain personal knowledge of a dishonor destroys or attempts to destroy the contract
16 between the People and those delegated to serve, ergo, the Constitution of the United
17 States and the Constitution of the State of Nevada.

18 51. The failure of the State of Nevada, during its state-authorized training of notaries, to
19 identify and instruct notaries in all of the duties notaries are authorized to perform
20 must be construed as a self-serving, deliberate attempt to discriminate between the
21 public and private duties by providing training for notaries choosing to operate solely
22 in the public venue, in order to subvert the Constitution of the United States and the
23 Constitution of the State of Nevada, is also a treasonous act.

24 52. At the very first live 'training' that Plaintiff attended in July 2010, required for
25 obtaining the appointment of the office of notary, course instructors, believed to be

1 appointed and/or selected by the State of Nevada, were adamant that all class
2 attendees, including Plaintiff “cannot do that”, when Plaintiff asked the question,
3 “What is the proper way to protest a non-negotiable instrument” reflecting a
4 determined plot to subvert and undermine the power of the People.

5 53. The State of Nevada prohibits protesting a negotiable instrument unless the notary
6 works for a bank, restricting the power of the State to public, commercial activity.
7 [Reference NRS 240.075(10)]

8 54. Nevada’s Secretary of State expanded its authority by assuming power in the private
9 venue over non-negotiable instruments as well as negotiable documents which cannot
10 be encompassed by the public prohibition, meaning the public prohibition cannot
11 encompass instruments of any type in the private.

12 55. The State of Nevada has no express or implied exclusivity over the use of the word
13 ‘protest.’

14 56. Protesting the dishonor of a party’s position comports with the definition of ‘protest’
15 as “A protest (also called a remonstrance, remonstrance or demonstration) is an
16 expression of bearing witness on behalf of an **express** cause by words or actions with
17 regard to particular events, policies or situations.”

18 57. The comment made by the former director of the National Association of Notaries
19 regarding this question from a notary: “Where can I learn how to do protests?”, ergo,
20 “You can’t do that (protest a dishonor)” reiterated three times, also demonstrates the
21 plot to disarm notaries in the private venue to obstruct them from obtaining private
22 judgments for the unjust enrichment of state governments and to the detriment of the
23 People.

24 58. The adamant stance of the above-mentioned director the National Association of
25 Notaries, was only alleviated when the notary posing the question added “The party I

1 want to do the protest for is NOT a U.S. citizen”, reflecting a well-orchestrated plot to
2 conceal remedies available to the People should state actors violate the People’s rights.

3 59. Government actors from any and all States of the Union, including Defendants, who
4 suppress the private functions of a notary in any way, i.e., by either obstructing the
5 obtaining of a private judgment or refusing to acknowledge and accept the judgment
6 as a foreign judgment into a public civil action, must be deemed as committing ‘mixed
7 war’ against the People.

8 60. The appointment of a notary office is not a license because the legal definition of
9 ‘license’ is “permission to do that which is otherwise illegal.”

10 61. Any and all States of the Union, whose state actors obstruct the private duty of a
11 notary, including Defendants’, to obtain personal knowledge of a dishonor, regardless
12 of whether or not that obstruction involves a state actor, must face charges of
13 tampering with a witness, coercing false testimony, and/or concealing inculpatory
14 and/or exculpatory evidence.

15 62. Any and all States of the Union, whose state actors obstruct a notary from obtaining
16 personal knowledge and/or producing testimony in a public venue, including
17 Defendants, must be charged with obstruction of justice and/or concealing relevant
18 evidence in order to achieve a pre-determined outcome in a public court.

19 63. Any and all States of the Union, including Defendants, whose state actors obstruct a
20 notary from obtaining personal knowledge and/or producing testimony in a public
21 venue, must be charged with obstruction of justice and/or concealing relevant
22 evidence in order to achieve a pre-determined outcome in a public court for the
23 purpose of unjust enrichment.

24 64. Any and all States of the Union, including Defendants, whose state actors obstruct a
25 notary from obtaining personal knowledge and/or producing testimony in a public

1 venue must be charged with obstruction of justice and/or concealing relevant evidence
2 in order to achieve a pre-determined outcome in a public court, compelling
3 participation in the public venue against the party's will in violation of the Thirteenth
4 Article in Amendment.

5 65. Any and all States of the Union, including Defendants, whose state actors refuse to
6 recognize and/or acknowledge a private settlement, regardless of whether or not any of
7 the parties are state actors, must be charged with discrimination against the People in
8 their protected, and understood as, 'private' class.

9 66. There is no prohibition against a Notary issuing a Notice of Dishonor to a party who
10 refused or failed to attempt private settlement before seeking judicial review, in the
11 private venue (not that the public actors necessarily could, would, or should know
12 what is lawful in the private venue).

13 67. State agents, including clerks of the court, deputy clerks, and judicial officers, who
14 permit court actions to be filed when evidence of a willing and knowing dishonor
15 exists, must be deemed as seeking unjust enrichment.

16 68. State agents who permit court actions to be filed when evidence of a willing and
17 knowing dishonor exists, must be deemed as usurping the power of the People.

18 69. State agents who permit court actions to be filed when evidence of a willing and
19 knowing dishonor exists, must be deemed as foraying into the private venue to
20 compel a party into the public venue against his will, which is a treasonous act.

21 70. There is no prohibition in the private venue against a Notary issuing a Notice of
22 Protest to a party who rejected the Notary's Notice of Dishonor and Opportunity to
23 Cure, prior to seeking judicial review.

24 71. There is no prohibition in the private venue against a Notary issuing a Certificate of
25 Protest to a party who requested a Notary's personal knowledge of a dishonor by said

1 Notary delivering a Notice of Dishonor and Opportunity to Cure, followed by a
2 Notice of Protest and Opportunity To Cure, prior to seeking judicial review.

3 72. The definition of 'Certificate' as applied to the 'Certificate of Protest' means
4 'evidence of title' reflecting that the Notary and only the Notary has title to the
5 dishonor, via a rigorous memorialization process and several opportunities to cure (to
6 demonstrate willful and calculated intent to dishonor), ergo, the right to testify based
7 on the Notary's personal knowledge of the dishonor of the party rejecting the
8 opportunity to settle the conflict in the private venue.

9 73. The definition of 'Certificate' as applied to the 'Certificate of Protest' means
10 'evidence of title' reflecting that the Notary and only the Notary has title to the
11 dishonor, via a rigorous memorialization process and several opportunities to cure (to
12 demonstrate willful and calculated intent to dishonor), ergo, the right to testify based
13 on the Notary's personal knowledge of the dishonor of the party rejecting the
14 opportunity to settle the conflict in the private venue, which personal knowledge is the
15 only acceptable evidence under the 'best evidence' rule.

16 74. Parties who receive a notarial-issued Notice of Protest and fail or refuse to cure their
17 dishonor, are stopped from stating a claim in a public proceeding, effectively
18 precluding the use of courts to instill intimidation, fear, or perversion of the truth or
19 the ability of the trier(s) of fact to evaluate and judge intent.

20 75. Just because the State of Nevada and other States of the Union specifically authorize
21 protesting notes, bills, bonds or Bills of Exchange (BoE) does not preclude the protest
22 process for other purposes.

23 76. Just because the State of Nevada and other States of the Union specifically authorize
24 protesting notes, bills, bonds or Bills of Exchange (BoE) does not preclude the protest
25

1 process for other purposes, most notably in the private venue where private contracts
2 preclude the interference of state actors.

3 77. The State of Nevada lacks any authority to foray into the private venue of the People
4 of Nevada to impose public law and/or public interpretations of legislatively-enacted
5 codes, statutes, ordinances, or policies onto the People of Nevada, or into the private
6 venue.

7 78. There is no lawful, written prohibition in the public venue against a Notary issuing a
8 Notice of Protest and Opportunity To Cure to a party in the private venue who rejected
9 the Notary's Notice of Dishonor and Opportunity To Cure, prior to seeking judicial
10 review [and the pattern and practice of Nevada's instructors who vehemently warn
11 students to never do protests is under color of law. Reference *OK Corp v. Williams*
12 *461 F. Supp 540*]

13 79. There is no lawful, written prohibition against a Notary issuing a Notice of Protest and
14 Opportunity To Cure to a party who rejected the Notary's Notice of Dishonor and
15 Opportunity to Cure in order to secure personal knowledge that any attempt to utilize
16 public courtrooms to override or otherwise negate the private judgment is a fraud upon
17 the court [and the pattern and practice of instructors of notaries to adamantly admonish
18 notaries from engaging in the protest process is a violation done under color of law].

19 80. There is no lawful, written prohibition against a Notary issuing a Notice of Protest and
20 Opportunity To Cure to a party who rejected the Notary's Notice of Dishonor and
21 Opportunity to Cure in order to secure personal knowledge that any attempt to utilize
22 public courtrooms to override or otherwise negate that private judgment is a deliberate
23 abuse of the court.

24 81. Parties, including attorneys such as Defendant Edward D. Kania, who colluded to
25 quash the binding evidence of a notary against Kania's client, must be charged with

1 foraying into the private venue for the purpose of destroying the private rights of the
2 People, such as the patron Plaintiff served at the time who sought a response from
3 Kania's client.

4 82. Attorneys such as Defendant Edward D. Kania, who advise clients such as Russell
5 Ricciardelli, in a matter set for private settlement prior to seeking judicial review, have
6 committed treason by invading the sanctity of the private venue where titles of nobility
7 are excluded by the Thirteenth Article in Amendment.

8 83. Attorneys such as Defendant Edward D. Kania, who advise clients such as Russell
9 Ricciardelli, in a matter set for private settlement prior to seeking judicial review, have
10 committed a conspiracy to invade the venue belonging to the People for the purpose of
11 compelling Plaintiff's patron into the public venue against her will, which is a
12 violation of the Constitution prohibiting involuntary servitude.

13 84. Attorneys such as Defendant Edward D. Kania, who pervert a notary's evidence of
14 dishonor by insisting that the Nevada Secretary of State penalize said notary, must be
15 disbarred for willingly and knowingly committing barratry which is defined as
16 'exciting a cause of action where there is none.'

17 85. The Secretary of the State of Nevada and its administrators, such as Mueller, makes
18 law when they obstruct Plaintiff's right and duty to issue private protests intended to
19 memorialize dishonors of a private settlement attempt.

20 86. The Notice of Dishonor delivered to Mueller, an administrator for the Secretary of
21 State of Nevada for her dishonor of Plaintiff's Conditional Acceptance since
22 December of 2017, reflects the SoS's conflict of interest in the denial of the
23 appointment of the office of notary to Plaintiff.

24 87. Secretary of State of Nevada maintains an inaccurate record damaging to Plaintiff
25 through the withholding of the authorization to acquire a new stamp thereby denying

1 said appointment without a process suspending, revoking, and/or cancelling Plaintiff's
2 appointment.

3 88. Secretary of State of Nevada maintains an inaccurate record damaging to Plaintiff
4 through the withholding of the authorization to acquire a new stamp exemplifying said
5 appointment without a process suspending, revoking, and/or cancelling Plaintiff's
6 appointment, but solely on the word of a private citizen inquiring into the process.

7 89. Secretary of State of Nevada maintains an inaccurate record, apparently unofficial,
8 damaging to Plaintiff through the withholding of the stamp denying said appointment
9 without a process suspending, revoking, and/or cancelling Plaintiff's appointment, but
10 solely on the word of a private citizen inquiring into the process who may be
11 personally known to said Secretary, i.e., as a 'favor' to a 'friend'.

12
13 **A4. DETRIMENTS AND DAMAGES**

14 90. Plaintiff incorporates by reference paragraphs 1 through 89 as if fully set forth herein.

15
16 91. Plaintiff is now subject to being prevented from performing the lawfully prescribed
17 duties of a notary who is intended to serve as a bridge between the private and public
18 venues in order to obtain private judgments.

19 92. Plaintiff has and is continuing to suffer the chilling effect of being illegally stripped of
20 her office as a notary entrusted with protecting the private venue for those patrons who
21 choose to abide by the mandate that requires parties in conflict to attempt private
22 settlement prior to seeking judicial review.

23 93. Plaintiff has and is continuing to suffer the chilling effect of being illegally stripped of
24 her office as a notary entrusted with protecting the private venue for those patrons who
25

1 choose to memorialize dishonors of rogue state actors who use power, concealment of
2 knowledge, and intimidation through the courts to oppress their adversaries.

3 94. The People, the creditors, the assets, the *raison d'être* of all lawfully instituted
4 governments, delegate certain authority to state actors which, when usurped and
5 perverted by miscreants such as Defendants, are subjected to tyranny and oppression
6 when even one remedy, such as provided by Plaintiff in her office as notary bridging
7 the gap between the public and private venues, which undermines and destroys the
8 People and the rights of the People, constitutes treason.

9 95. Plaintiff has been damaged by the unsworn 'complaint' (conveniently based on belief
10 only) made to Defendant Secretary of State Barbara G. Cegavske by Defendant
11 Russell Ricciardelli on the advice of his State Bar approved attorney, Defendant
12 Edward D. Kania, through the illegal and unlawful stripping of Plaintiff's office to
13 serve the People as a servant and bridge designed to maintain peace between the
14 People and their delegated public servants, having the inability to serve numerous
15 patrons whose abuse at the hands of government agents languishes because Plaintiff
16 cannot memorialize those dishonors.

17 96. It is detrimental to the legal system of the United States when personal favors to
18 'friends' by officials in 'high places' controls who is penalized and deprived of
19 appointments, as was Plaintiff upon the unsworn 'word' of a party who benefits from
20 the deprivation through the inability to be held accountable.

21 97. Plaintiff watches helplessly as people who choose to settle conflicts and/or handle
22 private affairs without the interference of government, have no remedy because of the
23 illegal curtailing of Plaintiff's office at the hands of instigators such as Defendant
24 Ricciardelli and Defendant Kania, cajoling, influencing, and/or otherwise colluding
25 with Defendant Secretary of State Barbara G. Cegavske, who willingly and knowingly

1 unilaterally fined, penalized, and stripped Plaintiff of the office which enables Plaintiff
2 to provide the one remedy available to People who choose to avoid the public venue
3 with its attorneys and courts.

4 98. The damages to the People of the State of Nevada, include but are not limited to: (a)
5 rogue government agents such as SoS Cegavske and Mueller violating their own rules
6 and regulations regarding conducting a hearing PRIOR to assessing fines, which lies
7 as *prima facie* evidence that Defendants denied due process in the face of the strict
8 mandates to give fair hearings and not take the word of an unsworn inquiry asking if
9 Plaintiff's behavior was an anomaly or if the State Defendants had any knowledge that
10 Plaintiff was not performing properly in the private venue. This denial of due process
11 portends a foreboding trend for the People of the State of Nevada should Defendants
12 not be held accountable, for once guilt is not only presumed, but punishment allocated
13 immediately contrary to the restrictions on the state actors, oppression becomes
14 tyranny.

15 99. Plaintiff is entitled to compensatory and special damages as they relate to mental
16 distress. Plaintiff felt disenfranchised and 'attacked' by Plaintiff's own government
17 whose oppression reached into the private venue, with attempted use of threat, duress,
18 coercion, and oppression to compel Plaintiff to perform for the public venue
19 exclusively, then sought to lure Plaintiff into the public venue by charging Plaintiff
20 with secret allegations and unilaterally finding Plaintiff 'guilty/liable' for \$5200 in
21 fines and penalties without a hearing, ensuring that Plaintiff would have to address the
22 public penalties in a public forum and appear to have waived the protections of the
23 private venue.

24 100. Defendants' foray into the private venue destroyed the sanctity of the private
25 venue where the People are to be protected as the *raison d'etre*, ergo, the assets, the

1 grantors of the private trust, which destruction of the freedom caused Plaintiff much
2 emotional distress and grief that Plaintiff's own country would violate the People and
3 Plaintiff in particular, who sacrificed to provide remedies outside the State courts for
4 those who sought private settlement prior to seeking judicial review. Defendants
5 benefitted by refusing to renew Plaintiff's notarial office appointment in that People
6 deprived of Plaintiff's services in assisting private settlements had no other choice but
7 to pay Defendants' employer for court services. Plaintiff was no longer 'free' but was
8 deprived of the freedom to serve the People when Plaintiff did not succumb to the
9 desires of Defendants, demanding certain performance under involuntary servitude or
10 else suffer the consequences of living in virtual exile. These elements satisfy the
11 presumed general damages and the aggravated objective and subjective bad faith
12 allowances to make Plaintiff whole.

13 101. Plaintiff gave serious thought to quitting servicing the needs of the People,
14 surrendering to the tyranny and living as a recluse rather than agreeing to the
15 restrictions Plaintiff's 'master state' imposes, i.e., to serve only the public. Plaintiff
16 lived in anguish over the fact that the very government which Plaintiff believed had
17 the desire of curtailing rogue state actors, would chill Plaintiff's efforts to bring those
18 rogues to justice through private settlement attempts to flush out the miscreants.
19 Plaintiff who glories in the opportunity to assist the People who are subjected to
20 oppression, was herself subjugated through suppression by Defendants who knew or
21 should have known their actions were malicious and the denial of due process is, in
22 and of itself, when predicated upon nothing more than an unsworn piece of paper from
23 a disgruntled third party, aggravated objective and subjective bad faith.

24 102. Plaintiff is entitled to declaratory relief because Defendants cannot trample the
25 private venue as if the People do not have and/or are not entitled to the safe-haven of a

1 venue outside the 'state.' When the People are absorbed into the 'state', there are no
2 natural freedoms and the People and the State merge into one with no clear delineation
3 between them which destroys freedoms, rights, liberties, and the line of demarcation
4 between the public and the private trusts. Special damages are appropriate when
5 Defendants know their over-reaching actions subject Plaintiff to gross confusion and
6 fear over waking up one morning and finding an un-noticed demand for \$5200 facing
7 her. In addition, general damages which may be either pecuniary or non-pecuniary,
8 must be applied whether proven or presumed when the injury extends beyond Plaintiff
9 to the entire populace of the United States.

10 103. Special damages for common law remedies are provided for under 42 USC 1988,
11 and common law is operative in the private venue where Plaintiff performed the acts
12 Defendants unilaterally deemed 'illegal'.

13 104. Special damages for common law remedies are provided for under 42 USC 1988,
14 and Defendants' foray into the private venue, albeit surreptitious and conniving, is a
15 blatant breach of the common law which is, in the hierarchy of the law, separate and
16 distinct from the venue where Defendants garner their authority.

17 105. Defendants had actual knowledge that Defendants were committing
18 Constitutional violations via Plaintiff's Conditional Acceptance, namely their seizure
19 of Plaintiff's property interest. Their subsequent dishonor of the Opportunity to Cure
20 is *prima facie* evidence the act was malicious and both objective and subjective bad
21 faith acted out under color of law in an aggressive act of oppression which mandates
22 exemplary damages.

23 106. Defendants' foray into the private venue reflects a constant pattern and practice of
24 willful and gross disregard of Plaintiff's rights and the rights of the People living
25 peacefully in the private venue where they are immune from compelled appearance in

1 the public venue, mandating severe exemplary damages, particularly since the letter of
2 inquiry from RR via his attorney Kania did not and could not invite or authorize the
3 trespass into the private venue.

4 107. Defendants knew or could have discovered that the U.S. and Nevada
5 Constitutions bind state actors to specific boundaries and that crossing them in either
6 direction is an act of aggression prohibited without reservation. Defendants' trick to
7 compel performance in the public only by withholding Plaintiff's office and imposing
8 penalties and fines without a hearing, was foiled by Plaintiff's Conditional Acceptance
9 using the private administrative process and emphasizes the *ultra vires* actions of
10 Defendants who committed these Constitutional violations under color of law,
11 ensuring their liability in their private and individual capacities. The Constitutional
12 prohibitions bind Defendants and must be subject to heavy exemplary damages due to
13 the nature of the aggravated acts which infringed on the freedoms and liberties of all
14 People entitled to seek private settlement prior to seeking judicial review.

15 108. Protecting intangible interests such as the freedom to obtain private judgments
16 outside the statutory state courts is as significant as any other right which restricts the
17 aggression of state actors against the people, for depriving the People of any remedy
18 against corrupt officials constitutes tyranny.

19 109. Recovery of exemplary damages is predicated upon: (1) a showing of
20 compensatory damages; (2) necessity for vindication of Plaintiff; (3) need to deter
21 further such actions, not only against these Defendants, but against all states who
22 penalize notaries for assisting the People obtain justice; and, (4) preserving the law
23 enforcement rights of the People to serve as private attorneys general.

24 **A5. EXHAUSTION OF ADMINISTRATIVE REMEDIES**
25

1 110. Plaintiff incorporates by reference paragraphs 1 through 109 as if fully set forth
2 herein.

3 111. Plaintiff herein alleges the exhaustion of administrative remedies as follows:
4 Plaintiff first complied with the tenet in *OK Corp v. Williams*, 461 F. Supp 540, which
5 mandates that all entities must attempt private settlement prior to seeking judicial
6 review on or about November 30, AD2017. Plaintiff tendered a conditional
7 acceptance of Defendant Secretary of State and Lenora Mueller's offer that Plaintiff
8 passively allow the surreptitious stripping of Plaintiff's office without any official
9 suspension, revocation, and/or cancellation, and to quietly consent to pay \$5200 in
10 fines and, in effect, cease and desist performing unidentified, prohibited acts, all
11 unilaterally imposed on the basis of an innocuous inquiry which SoS converted into a
12 complaint and a FINDING OF GUILT without contacting Plaintiff even once for
13 possible opposing *confidential commercial information* (cci), which, ironically, is the
14 stalwart of the data integrity board cycle instituted at every branch of government in
15 the State of Nevada, not to mention the federal agencies.
16

17
18 112. Plaintiff also sent to the SoS, two sets of FOIA requests under Nevada's Public
19 Records Act, the first on December 19, AD 2017, and the second on October 22,
20 AD2018, the latter of which has not been responded to.

21 113. Additionally, Plaintiff's notary did not receive a response to the Notice of
22 Dishonor and Opportunity To Cure that Plaintiff's notary delivered to Mueller in July,
23 AD2018, indicating the SoS via Mueller remained silent to the Conditional
24 Acceptance which, to date, indicated a deliberate choice to remain silent to the
25 settlement of the crucial issues raised herein.

1 114. As a last resort, whether such a move was required or not, Plaintiff filed a claim
2 for damages with the SoS on or about October 11, AD2018, to ensure that all remedies
3 had been exhausted. There has been no response from SoS or the State's Attorney
4 General, Adam Laxalt to whom the claim was delivered.

5 115. Therefore, Plaintiff seeks a declaratory judgment that Plaintiff is entitled to relief
6 which prevents the destruction of the private venue through a State's office/officer
7 who forays into the private venue to impose public rules which not only diabolically
8 oppose the intent of the tenet mandating attempts at private settlement, but which
9 portend to authorities not delegated, that usurp the power of the People in determining
10 the means and manner in which private settlements are obtained so that the State
11 enriches it coffers at the expense of the State's creators.

12 **B. SECOND CAUSE OF ACTION**

13
14 (For Declaratory Relief Regarding Enforcement of Unofficial And Unilateral
Acts of State Officers in Violation of the U.S. Constitution)

15 116. Plaintiff incorporates by reference paragraphs 1 through 115 as if fully set forth
16 herein.

17 117. Plaintiff alleges that an actual controversy has arisen and now exists between
18 Plaintiff and above-cited Defendants concerning their respective rights and duties in
19 that (I) Plaintiff contends: (A) that even though Plaintiff accepted a notarial
20 appointment from the State of Nevada's Secretary of State Office to perform in either
21 the public or private venue, Plaintiff still retains all rights of a natural, private citizen
22 and surrendered nothing secured by either the State of Nevada or the United States'
23 Constitutions, including (1) the due process mandates or the capacity to contract at
24 will without government interference, coercion, or threats, (2) the State of Nevada
25 lacks authority to dictate how Plaintiff implements the status of notary when

1 interacting with beneficiaries to the public trust as private assets living free outside
2 government purview, entitling Plaintiff to exercise the notarial office to comport with
3 tenets and opinions as they relate to performing all duties cited in the Nevada Notary's
4 Handbook, without obstruction from the Secretary of State and/or the State of Nevada,
5 by creating the necessary bridge between the public and private venues when the
6 People elect to seek private settlement judgments capable of recognition in the public
7 venue; (3) Plaintiff acts in accordance with the tenet expressed in *OK Corp v Williams*,
8 *461 F. Supp 540* since Defendant SoS has refused to provide alternatives for the
9 People to achieve private settlements in other manners which must be construed as (a)
10 coercion to contract with State courts and (b) suppression of a remedy acknowledged
11 in the *OK Corp* opinion; (4) Plaintiff, within and/or without the authority inherent in
12 the 'office' of 'notary' is entitled to due process even if, and especially when,
13 Defendants apply political extortion (do it our way or else) to actions Defendants
14 desire to ignore or interpret differently from the interpretation applied in the private
15 venue; (5) Plaintiff's expectation to trust that no government agency will collude with
16 another citizen unable to, incapable of, and/or unwilling to state a claim, is not
17 unreasonable because such collusion results in a conspiracy which oppresses and chills
18 Plaintiff's duty to assist one of the People seeking to settle commercial affairs in the
19 private because the private citizen's interpretation of the issue contravenes Defendant
20 SoS's unjust enrichment ploys, while (II) Defendants' acts, actions and/or omissions
21 contend: (A) Defendants gained an implied exemption to the prohibition against
22 interfering with private contract because Defendants (1) granted Plaintiff the office of
23 notary and now is in the debt of the State, (2) received the commercial energy of a
24 private citizen requesting an inquiry, (3) have been delegated special authority to foray
25 into the private venue to direct commercial activity which might end up in the public

1 venue asking a judge to convert a private settlement into a public judgment capable of
2 enforcement, particularly against errant state actors; (B) the chilling of Plaintiff's
3 capacity to assist the People in obtaining private settlement judgments in the private
4 venue is fair competition practices advancing the compelled use of State courts; (C)
5 Plaintiff is not entitled to the **mandated** administrative process wherein an
6 independent investigator collects confidential commercial information from all parties
7 to an issue and provides an administrative law judge to review and determine the
8 outcome because Plaintiff is operating in the private venue where such administrative
9 privileges established by the State for each agency does not extend; (D)
10 circumvention of the mandated Data Integrity Board process exonerates SoS from the
11 ramifications of denial of a hearing, imposition of unilateral fines and the penalties of
12 stripping of the office of notary without probable cause, and, (E) Plaintiff's activities
13 of assisting private settlements infringe upon the State's monopoly of offering court-
14 adjudicated settlements which are touted as fair and impartial while the private
15 administrative process has no such 'guarantees'.

17 **B1. DETERMINATION OF RIGHTS AND RESPONSIBILITIES**

18
19 118. Plaintiff incorporates by reference paragraphs 1 through 117 as if fully set forth
20 herein.

21 119. This Honorable Court is asked to determine the rights and responsibilities of (A)
22 Defendants as they pertain to adhering to the principles of due process and
23 administrative law proceedings involving Plaintiff who received an 'office' to perform
24 as a notary, and (B) the rights and responsibilities of Plaintiff as they pertain to the
25 requirement to accept unilateral rulings involving Plaintiff's performance in a venue

1 outside the scope of Defendant State of Nevada's Secretary of State, notably the
2 private venue where administrative private settlements are not constrained, controlled,
3 or inhibited.

4
5 **B2. FACTS**

6
7 120. Plaintiff incorporates by reference paragraphs 1 through 119 as if fully set forth
8 herein.

9 121. The First Amendment right to speak freely includes the right to contract at will
10 without government interference and has never been repealed or replaced although
11 Defendants have stripped Plaintiff of a necessary office without probable cause which
12 serves as a bridge between the public and private venues.

13 122. The Fourth Amendment right to property and property interference remains free
14 from arbitrary seizure, yet Defendants have plundered Plaintiff's property interest in
15 the office of notary in order to gain unjust enrichment via unnecessary court actions.
16 At no time has Plaintiff been notified that Plaintiff has been deemed officially
17 unworthy of serving as a notary due to suspension, revocation, and/or cancellation.

18 123. The due process clause in the Fifth Amendment was clearly circumvented when
19 Defendants colluded with a state actor/attorney, Kania, and his client, RR, to accuse,
20 find guilty, and penalize Plaintiff without any hearing or opportunity to challenge the
21 accusations, which, only if this were the Inquisition might be tolerated.

22 124. Defendant state actors forayed into the private venue to impose state statutes upon
23 Plaintiff's performance by penalizing Plaintiff, then sabotaged Plaintiff's ability to
24 assist the People desirous of adhering to the tenet mandating attempts at private
25 settlement by obstructing Plaintiff's ability to obtain the necessary notary stamp

1 through collecting the fee but not delivering the certificate authorizing the stamp.
2 Involuntary servitude resulted when SoS expropriated Plaintiff's seal without the
3 authority to determine Plaintiff's role in the private venue that then excluded the acts
4 Plaintiff considers crucial to maintaining a checks and balance on rogue state officials.
5 Defendant SoS usurped Plaintiff's power as well as the right of the People to hold
6 miscreants in the public accountable.

7
8 **B3. PLAINTIFF MOVES THE COURT**

9 For a declaration that:

10 125. Plaintiff incorporates by reference paragraphs 1 through 124 as if fully set forth
11 herein.

12 126. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
13 Plaintiff without probable cause.

14 127. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
15 Plaintiff based on an unsworn letter of inquiry.

16 128. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
17 Plaintiff without collecting confidential commercial information from Plaintiff.

18 129. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
19 Plaintiff without utilizing the mandated administrative process.

20 130. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
21 Plaintiff without providing Plaintiff an opportunity to cure.

22 131. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
23 Plaintiff without providing Plaintiff the opportunity to submit exculpatory evidence.

24 132. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
25 Plaintiff without due process.

1 133. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
2 Plaintiff without providing Plaintiff the opportunity to know or face Plaintiff's
3 accusers.

4 134. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
5 Plaintiff without distinguishing between the private venue and the public venue.

6 135. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
7 Plaintiff which deprives Plaintiff and Plaintiff's patrons of the opportunity to obtain
8 the mandated private settlement attempt.

9 136. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
10 Plaintiff which deprives Plaintiff and Plaintiff's patrons of the opportunity to obtain
11 the mandated private settlement attempt requiring Plaintiff and Plaintiff's patrons (the
12 People choosing private settlement) to utilize state courts to obtain judgments.

13 137. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
14 Plaintiff which deprives Plaintiff and Plaintiff's patrons of the opportunity to obtain
15 the mandated private settlement attempt, compelling Plaintiff and Plaintiff's patrons
16 (the People) into the public venue against their will.

17 138. Nevada Secretary of State unilaterally charged, adjudicated, fined, and penalized
18 Plaintiff which deprives Plaintiff and Plaintiff's patrons of the opportunity to obtain
19 the mandated private settlement attempt, depriving Plaintiff and Plaintiff's patrons (the
20 People) of a remedy outside the scope of government.

21 139. The compelled performance in the public venue constitutes involuntary servitude.

22 140. The compelled performance to contract with the public courts constitutes
23 government interference with the right to contract freely at will.

24 141. The letter submitted to SoS by Russell Ricciardelli (RR) requested and required
25 investigation by SoS to determine if the request was founded on facts.

1 142. The letter submitted to SoS by RR was at the behest of a state actor, Attorney
2 Edward D. Kania.

3 143. The letter submitted to SoS by RR was at the behest of a state actor, Attorney
4 Edward D. Kania and was for the sole purpose to vex and annoy.

5 144. The letter submitted to SoS by RR was at the behest of a state actor, Attorney
6 Edward D. Kania and was in retaliation for Plaintiff's patron obtaining a private
7 judgment against RR and Kania who were involved in a scheme to avoid detection in
8 an action involving sexual harassment and influencing a state court 'judge'.

9 145. The letter submitted to SoS by RR was at the behest of a state actor, Attorney
10 Edward D. Kania who had some connection and/or association with Defendants
11 Cegavske and/or Mueller.

12 146. Nevada Secretary of State had a duty to collect evidence from all parties to the
13 alleged issue with Plaintiff and submit everything to an administrative law judge.

14 147. SoS had a duty to issue the notarial stamp to Plaintiff after accepting and
15 negotiating (cashing) the money order Plaintiff paid for the fee.

16 148. SoS had a duty to return the fee if SoS had grounds for not renewing Plaintiff's
17 office.

18 149. SoS has not declared Plaintiff's office as suspended, as reflected by the published
19 list posted by the Office of SoS on the State of Nevada Secretary of State website on
20 or about October 1st, 2018.

21 150. SoS has not officially declared Plaintiff's office as revoked, as reflected by the
22 published list posted by the Office of SoS on the State of Nevada Secretary of State
23 website on or about October 1st, 2018.
24
25

1 151. SoS has not officially declared Plaintiff's office as cancelled, as reflected by the
2 published list posted by the Office of SoS on the State of Nevada Secretary of State
3 website on or about October 1st, 2018.

4 152. The retention of Plaintiff's fee without the official suspension, revocation, and/or
5 cancellation of Plaintiff's office constitutes unjust enrichment.

6 153. Nevada Secretary of State demonstrated a clear bias by unilaterally depriving
7 Plaintiff of the official stamp based on nothing more than a letter of inquiry from a
8 man who holds a grudge against Plaintiff and/or Plaintiff's patron.

9 154. An independent investigation, such as the kind required during the data integrity
10 board cycle process, would have uncovered the retaliatory motive behind the letter RR
11 wrote at the behest of an attorney (Kania) whose suspension from the Nevada Bar is in
12 the hands of the Nevada Supreme Court (case #75624) and USDC case
13 # 2:17cv02178MMD-CWH, wherein Plaintiff's patron exposed criminal activity using
14 the private administrative process to obtain a judgment which estops RR and Kania
15 from arguing in the public venue a position each refused to provide in the private
16 venue regarding sexual harassment based housing discrimination and illegally
17 influencing a court officer.

18
19 **B4 DETRIMENTS AND DAMAGES**

20
21 155. Plaintiff incorporates by reference paragraphs 1 through 154 as if fully set forth
22 herein.

23 156. Plaintiff is subjected to a tyrannical decision by Nevada's SoS which differs not
24 from decisions routinely imposed in oppressive countries, dispossessed of a voice to
25 defend against nebulous accusations that Plaintiff performed an act in the private

1 venue which the public venue portends to control, and which cannot be tolerated in a
2 free society.

3 157. Plaintiff has and continues to suffer the injustice of being charged, tried, and
4 convicted without any phase of the mandated administrative process undertaken,
5 which is tantamount to the baffling and incredulous penalties inflicted without
6 opportunity to cure, which in fact, was available to SoS's office when Ross Miller was
7 presented with the opportunity to correct any potential wrong-doing Plaintiff engaged
8 in since September 25, AD2010, yet never did.

9 158. The People, the creditors, the assets, the *raison d'être* of Nevada and the United
10 States have no protection from the repressive 'presumed guilty' practice exhibited by
11 the Nevada SoS if Plaintiff's penalties are permitted to stand.

12 159. The People never delegated any waiver to the due process clauses of either the
13 Nevada or the United States Constitutions, and the usurpation of both administrative
14 and judicial processes by the SoS Office is detrimental to the freedom from selective
15 prosecution where accountability rests in the hands of the very government office
16 conducting the prosecution against Plaintiff. Free people must be protected from such
17 commandeering and condescending acts.

18 160. Plaintiff has been damaged by the stain on Plaintiff's reputation and good-will,
19 which resulted in the smearing of Plaintiff's name.

20 161. Because SoS has not listed Plaintiff's name as one whose office was suspended,
21 revoked, or cancelled, Plaintiff has no plain, speedy remedy, and SoS must be
22 enjoined either via a writ of prohibition against the unlawful withholding of the office
23 where the fee tendered has been accepted, or via a writ of mandamus compelling the
24 release of the certificate authorizing the office to Plaintiff.

25

1 162. The destruction of the trust inherent in a government of the people, by the people,
2 and for the people results in irreparable damage and SoS of Nevada's relentless
3 insistence on enforcing an unsubstantiated allegation which was based on a foray into
4 the private venue is immeasurable. SoS has created a virtual prison wherein Plaintiff
5 is expected to remain silently convicted of nebulous, unspecified premises, defined for
6 purposes herein as "a proposition from which another is inferred".

7 163. SoS's uncompromising stand presumes the private venue of the People are willing
8 to tolerate the SoS's exertion of power over the private venue, an unconscionable
9 assault on the assets of the State which State officials and actors are sworn to protect,
10 not persecute or stultify as if the State were entitled to operate a monopoly without
11 competition, even from foreign venues.

12 164. The acts, actions, omissions, and lack of transparency of Nevada's SoS in
13 charging Plaintiff without probable cause on an unsworn letter of inquiry from a
14 'personal friend', and assessing fines and stripping of an office without justification
15 threatens the sovereignty of the People of Nevada and the United States of America,
16 and that must be construed as treason, for any undermining of the government, the true
17 government, i.e., the People, is tantamount to mixed war and must be curtailed
18 immediately.

19 165. Nominal damages for malicious prosecution – which an unnoticed procedure must
20 be deemed as, are appropriately called for herein due to Defendants' presumed
21 knowledge that administrative law judges are established in every agency within the
22 State of Nevada, for where there is no remedy, there can be no law, at least not
23 enforceable law. Defendants maliciously prosecuted Plaintiff on an unsworn letter of
24 inquiry and then unilaterally, without noticed hearing or collection of confidential
25

1 commercial information to determine if exculpatory evidence existed, found Plaintiff
2 'guilty/liable' and assessed fines and penalties.

3 166. Actual injury not only encompasses out-of-pocket expenses, which is reflected in
4 the cost of the renewal course and the fee for the authorization stamp, but includes
5 defamation or falsehood or impairment of reputation, standing in the community
6 and/or personal humiliation and mental anguish and suffering, which the facts show
7 Plaintiff suffered, losing face with patrons who were left hanging when Plaintiff's
8 office was 'suspended', 'revoked' or 'cancelled' without any records reflecting such
9 suspension, revocation, or cancellation.

10 167. Exemplary damages require a showing of a highly culpable state of mind in
11 Defendants, which Plaintiff demonstrates by establishing that for state actors to by-
12 pass due process even after the opportunity to cure, an extensive grace period, and a
13 notice of dishonor from Plaintiff's notary were presented. Since Defendants are
14 trained government employees with years of experience and well-versed in the data
15 integrity board cycles enmeshed in every state agency, their acts and omissions
16 EQUATES with malice, deserving of consequential damages. There is no excuse, for
17 if Plaintiff is bound by the law, so are these Defendants who might have easily
18 conducted a hearing to hear the true nature of Defendants Ricciardelli and Kania's
19 inquiry.

20 168. Pursuant to the two theories for damages, general damages without proof of loss
21 are recoverable if Constitutional rights are to remain valuable and there is a strong
22 need to deter further violations; the need to deter to protect the private venue of the
23 People from those who would foray into or coerce/lure People out of the safety of the
24 private venue cannot be overstated. To protect the People from those state actors who
25 would invade or intrude into the private's business IS the business of the judiciary.

1 When the executive branch's acts are called into question, it is the mandate of the
2 honest judiciary to weigh said acts to determine if the acts are in harmony with the
3 intent of the law, and there can never, in a Constitutional Republic, be an intent for the
4 public servants delegated the duty to preserve the private People, to interfere, obstruct,
5 or destroy the integrity of the *raison d'être*.

6 169. This particular cause is ripe for Declaratory Judgment because the Court will find
7 that, if a hearing were held, the outcome would not have been the same [reference:
8 *Unified School District #480 v. Eperson*, 551 F2d 254 (1977- 10th Circuit)]. Had
9 Defendants conducted a cursory investigation, no justification for Defendants' acts
10 would have arisen.

11 170. Causation establishing Defendants' acts as malicious include: (a) use of an
12 unsworn inquiry from a disgruntled party (b) without conducting the mandated
13 independent investigation seeking *confidential commercial information* (cci) (c)
14 submission to a data integrity board head, whether judicial officer or administrative
15 law judge, indicating Defendants chose to assign more weight to the disgruntled third
16 party (RR) and his attorney than Defendants did to the facts or evidence, or lack
17 thereof, before them. This Court may call for an investigation to determine if undue
18 influence was exerted by RR and/or Kania, who have similar allegations pending in
19 USDC Court action #2:17cv02178 MMD-CWH

20
21 **B5 EXHAUSTION OF REMEDIES**

22
23 171. Plaintiff incorporates by reference paragraphs 1 through 170 as if fully set forth
24 herein.

1 172. On or about November 30, AD2017, Plaintiff tendered a conditional acceptance
2 of Defendant Mueller and Secretary of State's offer that Plaintiff passively allow the
3 surreptitious stripping of Plaintiff's office without any official suspension, revocation,
4 and/or cancellation, and to quietly consent to pay \$5200 in fines and, in effect, cease
5 and desist performing unidentified, prohibited acts, all unilaterally imposed on the
6 basis of an innocuous inquiry which SoS converted into a complaint and a FINDING
7 OF GUILT without contacting Plaintiff even once for possible opposing *confidential*
8 *commercial information* (cci), which, ironically, is the stalwart of the data integrity
9 board cycle instituted at every branch of government in the State of Nevada, not to
10 mention the federal agencies.

11 173. Plaintiff also sent to the SoS, two sets of FOIA requests under Nevada's Public
12 Records Act, the first on December 19, AD2017, and the second on October 11,
13 AD2018, the latter of which has received no response.

14 174. Additionally, Plaintiff's notary issued a Notice of Dishonor to Mueller indicating
15 that she and SoS remained silent to the Conditional Acceptance which, to date,
16 indicates a deliberate choice to remain silent to the settlement of the crucial issues
17 raised herein.

18 175. As a last resort, whether such a move was required or not, Plaintiff filed a claim
19 for damages with the SoS to ensure that all remedies had been exhausted. This
20 occurred on October 11, AD2018, and there has been no response from SoS or State's
21 Attorney General, Adam Laxalt, to whom the claim was delivered.

22 176. Therefore, Plaintiff is entitled to a declaratory judgment which adjudges Nevada's
23 SoS as liable for denial of due process, and compelling Plaintiff out of the sanctity of
24 the private venue into the public venue to prevent Plaintiff from providing a well-
25 recognized remedy to the People who utilize Plaintiff in her official capacity to obtain

1 private settlements which may then be recognized in the public venue for enforcement
2 purposes, harming not only Plaintiff, but the sovereignty of the American People.

4 **C. THIRD CAUSE OF ACTION – Injunctive Relief**

6 177. Plaintiff incorporates by reference paragraphs 1 through 176 as if fully set forth
7 herein.

8 178. The four vectors required for injunctive relief are met herein in that: (A) monetary
9 damages cannot compensate for Plaintiff's inability to serve as a bridge between the
10 public and private venues when any of the People seeking to obtain private settlement
11 PRIOR to seeking judicial review request Plaintiff's assistance; (B) the public interest
12 is clearly destroyed when the People are compelled into the public courts using State
13 authorized attorneys who pretend the private settlement was attempted and failed; (C)
14 irreparable harm occurs when public officials invade the private venue of the People
15 for the purpose of controlling activities against the right to contract at will, which
16 achieves unjust enrichment for the State in ways which exceed monetary gain, i.e.,
17 which usurp the power of the People to live within the realm of logic, reasoning, and
18 common sense where no person or property is harmed; and, (D) property rights are
19 confiscated without due process, including but not limited to stealing Plaintiff's
20 notarial office and the pillaging of People's private judgments.

21 179. Defendants' acts and omissions were under color of law and without authority,
22 leaving Plaintiff without a remedy to file an objection to an administrative law judge's
23 order since no administrative law judge weighed any controversy, mandating a
24 preliminary and permanent injunction, which may be in the nature of a Writ of
25 Prohibition, prohibiting Defendants from continuing to withhold the office Plaintiff

1 paid for with legal tender, time, and training, or a Writ of Mandamus, compelling
2 Defendants to issue the notary office predicated upon payment of the application fees,
3 completion of training, and, the lack of grounds for suspension, revocation, and/or
4 cancellation.

5 180. Compensatory damages for the cost of the renewal class and the authorization,
6 both received and accepted by Defendants are mandated, as well as costs for the
7 renewed bond and oath of office administered through county recorder of Clark
8 County.

9
10 **D. FOURTH CAUSE OF ACTION - Civil Conspiracy**

11 181. Plaintiff incorporates by reference paragraphs 1 through 180 as if fully set forth
12 herein.

13 182. 'But for...' the actions of RR sending the letter seeking inquiry into the actions of
14 Plaintiff which resulted in an estoppel against RR in a sexual harassment action, and
15 the advise of Defendant Kania to stir up trouble in the public venue through planting a
16 seed with Kania's comrades at the SoS office in the State of Nevada, this action for
17 declaratory relief would not have arisen.

18 183. Defendants maliciously conspired to diminish the power of Plaintiff's testimony,
19 which carries the weight of two, by unilaterally converting a letter of belief into a
20 complaint, which Defendants knew or should have known did not constitute probable
21 cause in its unsworn state.

22 184. Defendants acted in concert to penetrate the private venue of Plaintiff by
23 circumventing the mandated administrative law proceeding at the state level and
24 assessing fines in the amount of \$5200 while conspiring to stop Plaintiff from
25 contracting with patrons desirous of obtaining private settlements pursuant to the tenet

1 in *OK Corp v Williams (ibid)* in order to present said judgments to the public for
2 enforcement, with a willing and knowing scienter that Defendants had no authority to
3 interfere with Plaintiff's right to contract in the private venue.

4 185. The conspirators may not have known one another in full, but as long as the same
5 goal served each defendant, the conspiracy resulted in the proximate cause of
6 Plaintiff's damages. It is clear from the foregoing facts that SoS Defendants benefitted
7 from the cessation of Plaintiff's actions through the redirection of court fees to the
8 public when judgment is sought in the state courts and RR and Kania benefitted by
9 diminishing the private judgment support Plaintiff acquired which would stop RR and
10 Kania from using a court to defend their illegal activities where they could continue to
11 unduly influence judges and/or pervert the public system. [Reference: USDC case #
12 2:17cv02178MMD-CWH.]

13 186. Defendants acted with malicious intent to defraud and injure Plaintiff.

14 187. Defendants knew the collusion to conspire to defraud would injure Plaintiff.

15
16 **E. FIFTH CAUSE OF ACTION - Civil Rights/Constitutional Violations**

17 (Regarding Nevada Secretary of State's Predetermination of Plaintiff's Rights, Duties, and
18 Responsibilities as Performed in the Private Venue.)

19
20 188. Plaintiff incorporates by reference paragraphs 1 through 187 as if fully set forth
21 herein.

22 189. The Court must view the following in light of one irrefutable fact, that RR sent an
23 unsworn letter of inquiry at the behest of an attorney and SoS's immediate rush to
24 judgment cannot be construed as anything other than denial of due process or there
25 would be abundant evidence that the mandated private administrative process

1 attempted to collect sufficient confidential commercial information from ALL parties,
2 that an administrative law judge within the department was assigned to weigh that
3 evidence and present a ruling after Plaintiff contributed substantive materials for
4 Plaintiff's position, and, ample proof that Plaintiff had the opportunity to supplement
5 whatever the law judge found lacking, lies as *prima facie* evidence that the outcome
6 had been predetermined in order to quash the power of the People. In the absence of
7 evidence gathered by Defendant SoS in this matter, the opinion in the *OK Corp*
8 decision does not exclude, restrict, limit, or otherwise prescribe how private
9 settlements must be obtained, or from where valid settlements must be acquired,
10 therefore, SoS of Nevada perpetrated a ruse upon Plaintiff and the People in a self-
11 serving, unjust enrichment scheme so cunning that only a die-hard student of
12 American law would know to stand up to it.

13 190. Beyond the self-serving, unjust enrichment benefits to the State, however, rests
14 the imperceptible, preemptive strike against the People's bulwark to hold miscreant
15 state actors accountable.

16 191. If an interest protected by a Constitutional right is not directly analogous to an
17 interest protected by common law damages, the common law rule should be tailored to
18 fit the Constitutional right in question.

19
20 (1). Right to Contract at Will – Article I § 10, United States Constitution

21
22 192. Plaintiff's right to contract is inviolate as evidenced by the Constitution for the
23 State of Nevada and the U.S. Constitution.

1 193. Obstruction of Plaintiff's right to contract accomplished by a subversive act chills
2 Plaintiff's right to free speech and petitioning for redress, in contradistinction to the
3 First Article in Amendment **which does not address contracts.**

4 194. Defendants' actions and omissions, in effect, annul Article 1 § 10 of the U.S.
5 Constitution which prohibits the right of the people to contract, and particularly
6 attempts to negate the bar against government intrusion into the private venue.
7 Plaintiff, during her lifetime, may have willingly and knowingly and/or inadvertently
8 traversed into the public to contract, but unless Plaintiff is 'caught' in the public
9 venue, Defendants cannot force Defendants' laws or statutes upon Plaintiff or the
10 People who patronize Plaintiff for relief from all forms of oppression and injury.

11 195. Defendants acted with malice when Defendants willingly and knowingly invaded
12 Plaintiff's contract with a patron, one of the People, which memorialized the dishonor
13 of a party (RR) who refused to settle an action regarding sexual harassment, depriving
14 Plaintiff of the right to contract with any of the People, rather than establishing, via
15 timely and adequate hearing, that this one contract was null and void.

16 196. The acts of all Defendants were malicious, performed under color of law, and
17 were the proximate cause of Plaintiff's injuries. All Defendants took direct adverse
18 actions to deceive Plaintiff under color of law, chilling Plaintiff's right to contract at
19 will and perform a series of observations designed to determine if the dishonor of an
20 attempt at private settlement was intentional and deserving of memorialization by a
21 notary witness whose testimony carries the weight of two. Defendants RR and Kania
22 perverted the delegated authority of a state office, either through friendship or some
23 form of 'debt', intended to subvert and/or corrupt the laws and statutes of the
24 legislatively enacted statutes that are restricted to the public venue, which actions did
25

1 not advance the legitimate goals of a claim in the private venue where Defendants lack
2 authority.

3 197. Exemplary damages strongly advocated in cases such as this, where the behavior
4 of Defendants is malicious, aggravated, and oppressive, and encompasses usurping
5 the power of the People in their private venue to contract for lawful purposes is
6 warranted.

7 198. Defendants RR and Kania attempted to use the government to extract vengeance
8 against Plaintiff's process which resulted in obtaining a private judgment against RR,
9 and must be deemed as the proximate cause of this entire fiasco, mandating punitive
10 actions to quell future attempts to fix a predetermined outcome within the ranks of
11 public servants, as RR and Kania have a pattern of doing.

12
13 (2). Right to Speak Freely and Petition for Redress - First Article in Amendment,
14 United States Constitution
15

16 199. Defendants' confiscation of Plaintiff's notary office on the nebulous grounds that
17 Plaintiff's actions were somehow unlawful in the private venue under the statutes of
18 the State of Nevada has a chilling effect on Plaintiff's right to speak freely outside the
19 scope and purview of the State of Nevada and clearly stultifies Plaintiff's right to
20 assist in obtaining redress against corrupt state actors and/or organizations on behalf of
21 the People.

22 200. Defendants' acts and omissions were deliberate and Defendants knew or should
23 have known that the willing and knowing withholding of Plaintiff's notary office
24 would unjustly enrich State coffers because People deprived of the remedy in the
25 private venue would have no other choice but to petition a state court against their

1 will, obliterating the intent of the remedy mandated in the *OK Corp (ibid)* decision.
2 Defendants not only substantially impaired Plaintiff's contractual relationships, but
3 have not, and cannot, demonstrate a significant and legitimate purpose behind the
4 divestiture of Plaintiff's office to assist the People in obtaining private settlements
5 capable of cognition in the public venue. Defendants' inability, failure, and/or refusal
6 to demonstrate that stripping Plaintiff of an office to stultify assisting the People in
7 obtaining a private judgment, was a remedy for a broad or social economic problem,
8 must be construed as deliberate obstruction or gross incompetence.

9 201. Defendants may not claim the withholding of Plaintiff's office is reasonable and
10 appropriate for its intended purpose, for the obvious purpose is illegal and/or unlawful,
11 which is how this Court must construe the true, unstated, purpose of Defendants, i.e.,
12 to compel the People into using state courts to obtain settlements, which greatly
13 augments the state's coffers while diminishing the People's access to a remedy to
14 which the People are entitled to obtain wherein the state has no piece of the action,
15 ergo, interest in the outcome. Compelling the People to seek remedy in a court,
16 without first attempting private settlement, regardless of which foreign venue the
17 People elect gives the State an interest in the judgment, for that which can be granted
18 can also be taken away. The deprivation is a racketeering scheme of major
19 proportions and differs not from twisting someone's arm to enforce one path to the
20 remedy of 'freedom from harassment.' Defendants' harassment of Plaintiff borders on
21 racketeering and a federally-initiated investigation into how many times Defendant
22 SoS may have perpetrated this ruse and with how many other 'cooperating' third
23 parties, seems the next logical step.

202. Depriving Plaintiff of the opportunity to assist in obtaining a private settlement outside the venue of the State creates forced performance for the benefit of a 'master' in a master/slave relationship, as discussed below.

(3). Right to Due Process – 5th Article in Amendment, United States Constitution

203. SoS held Plaintiff liable without conducting a hearing or mandated administrative law proceeding, without notice to cease and desist, and, without probable cause (an unsworn letter of inquiry from a disgruntled party against whom Plaintiff obtained a private settlement via dishonor), and unilaterally fined Plaintiff \$5200 and surreptitiously stripped Plaintiff of the office of notary for performing acts which are protected under Article I § 10 of the United States Constitution.

204. Defendants knew Plaintiff had a right and a duty to the sovereign People to provide a remedy in the nature of private settlement which is not only mandated (reference: *OK Corp v. Williams*) but which is capable of recognition in the public venue as a foreign judgment, in spite of the competition with Nevada's state courts for such procedures. Defendants RR and Kania used the authority of Defendant SoS in an attempt to subvert the private settlement which established an estoppel against RR and Kania in federal court case #2:17CV02178MMD-CWH, where Plaintiff's patron intended to use Plaintiff's personal knowledge that a *motion in limine* might apply. The very fact that Kania advised RR (just as Kania did when RR filed a second unlawful eviction action after receiving an unfavorable decision in the first action, contrary to the Nevada Supreme Court's ruling in *Five Star Capital v Ruby*) indicates the fear of the power of the personal knowledge Plaintiff wields to catch reprobates who abuse the legal system to avoid prosecution (just as Kania did when Kania 'influenced' a co-defendant 'judge' in the USDC action).

1 205. Plaintiff's injuries are inherent in the nature of the wrong; this is not a school
2 board, but a Secretary of State who knew or should have known that unjust enrichment
3 was a stone's throw away once Plaintiff (and other notaries) were prevented from
4 serving the duplicate purpose of a state court. Worse, an attack against the assets of
5 the country for unjust enrichment through compelled performance in the public while
6 conducting secret proceedings, desecrates the private remedies available to the People
7 by a Notary who undertakes a process Defendants saw as commercial competition for
8 their state courts. Based on these elements and the fact that Defendant Kania, an
9 attorney granted permission to practice in this State, was the defendant who prompted
10 all that has transpired. The laws can hardly be considered a foreign principle to any
11 Defendants.

12 206. The deprivation of due process was willingly and knowingly and maliciously
13 achieved under color of law by state actors whose intent was to unjustly enrich state
14 coffers while undermining the powers and authorities of the private venue.

15 207. Plaintiff has sovereign and constitutional rights and privileges as well as
16 significant liberty and property interests of which SoS willingly and knowingly and
17 maliciously deprived Plaintiff by thwarting the opportunity to defend during either an
18 administrative law proceeding through a State mandatory data integrity board hearing
19 or the conditional acceptance procedure initiated by Plaintiff.

20
21 208. The fundamental constitutional questions raised in this Complaint are beyond the
22 self-serving grasp of the Nevada's SoS. The Due Process Clause of the Fifth
23 Amendment to the U.S. Constitution requires that the SoS of Nevada, as an
24 administrative agency, provide Plaintiff with a fair and impartial adjudicatory
25 proceeding - both in appearance and in reality - that is free of any prejudgment on the

1 key factual and legal merits of the allegations in the concealed administrative
2 'complaint'.

3 209. As more fully alleged above, SoS has violated the State's due process
4 rights to a fair and impartial proceeding by having decided to not conduct an
5 administrative hearing, that as a matter of law, Nevada had jurisdiction over, and that
6 bestowing an office upon Plaintiff somehow granted powers to control Plaintiff's private
7 contracts and duty to secure private settlements in a venue **outside** the purview of the
8 State of Nevada.

9 214. As more fully alleged above, the SoS has also violated the Due Process Clause of
10 the Fifth Amendment to the U.S. Constitution by adopting and enforcing inherently
11 biased rules, permitting and condoning persistent and flagrant procedural violations
12 involving converting an unsworn letter of inquiry into a probable cause complaint and
13 prejudging Plaintiff guilty based on the word of a personal 'friend' or 'associate' of the
14 SoS as if immune from accountability which is the proximate cause of Plaintiff's
15 damages.
16

17 210. Defendants' wrongful abuse of Plaintiff's due process rights and security against
18 involuntary servitude, silencing Plaintiff's efforts to assist the People in obtaining
19 remedy, resulted in curtailing Plaintiffs ability to serve as the bridge between the
20 public and the private, obliterating opportunities to hold miscreant state actors
21 accountable, justifying severe exemplary damages, especially if Defendants'
22 employers condemn Defendants' actions.
23

24 211. Plaintiff is informed and believes and therefore alleges that the tactic of
25 withholding Plaintiff's office even though fees and training were 'accepted' as wholly

1 sufficient, is a conscious attempt to force Plaintiff to cave in to SoS's jurisdiction and
2 stipulate/succumb to the furtive pressure to 'operate' only in the public venue under
3 State law, as well as pay for the 'privilege' of abandoning patrons in the private venue
4 who, as the People, would be deprived of the remedy the court in *OK Corp* firmly
5 established. Compelling the People to obtain judgments in a state court desecrates the
6 *OK Corp* court's decision and must be construed as Nevada SoS's invasion of the
7 private venue while making law and becoming a dictatorship without firing a shot.

8 212. The widely-established precedent that denial of due process and the delay in
9 trying to compensate for the denial causes irreparable harm has no argument under the
10 reasonable man test, for memories fade and witnesses vanish. Plaintiff has been
11 irreparably harmed by a State officer or officers who knew or should have known of
12 the administrative law remedy created in every executive branch of that State's
13 government, particularly when perpetrated in collusion with a private citizen acting
14 under the advice of a state actor.
15

16 213. Additionally, the irreparable harm to Plaintiff's patrons whose attempt at private
17 settlement have been left hanging in mid-air cannot be rectified, although this action
18 may ameliorate the inability to ever obtain final judgments through a *nunc pro tunc*
19 retroactive grant in order to assuage arbitrary and capricious acts which abuse the
20 administrative procedures mandated by law.

21 214. The acts of all Defendants were malicious, performed under color of law, and
22 were the proximate cause of Plaintiff's injuries. All Defendants took direct adverse
23 actions to defraud Plaintiff, chilling Plaintiff's right to due process, using deception,
24 and avoidance and perversion of the laws and statutes on the books (enacted into law),
25 which actions did not advance the legitimate goals of a claim authorized by law.

(4) Illegal SEIZURE OF PROPERTY RIGHTS - Fourth Article in Amendment

215. Defendants, acting in collusion with a private citizen advised by a state actor, authorized to perform in the state courts and give advice to the public, took Plaintiff's payment and accepted Plaintiff's training regimen, then seized Plaintiff's interest in the office of Notary by withholding the document enabling Plaintiff to secure the symbolic stamp of the office of notary.

216. Defendants actions and omissions were willing and knowing and malicious and the proximate cause of Plaintiff's damages as well as the damage to the People now prevented from obtaining judgments in the private venue via the administrative process which Defendants knew or should have known obstructed justice through the deprivation of securing judgments in the private venue in contradistinction to the tenet in *OK Corp v Williams (ibid)*, leading to the desecration of a remedy for the People, notably against errant state actors.

217. Defendants forayed into the private venue to obstruct Plaintiff's ability to assist the People's right and duty under the *OK Corp* mandate, to secure private settlements then carry said judgments into the public venue for enforcement, which is an act of war against the People for no law may be enacted or enforced in the absence of a remedy and the destruction of the People's remedy to secure private settlements is tantamount to illegal seizure when Plaintiff was divested of the notarial office surreptitiously, since Defendants did not even make a pretense that Plaintiff's office had been suspended, revoked, or cancelled, and continued the pretense after receiving an opportunity to cure, damaging Plaintiff and the People.

1 218. Compensatory damages for the cost of the renewal class and the authorization,
2 both received and accepted by Defendants are mandated, as well as

3 219. Presumed general damages are also awardable based on the sneaky way
4 Defendants 'stole' Plaintiff's office, deprived Plaintiff of the opportunity to contract
5 with others, and prevented Plaintiff from completing several private administrative
6 processes left hanging.

7 220. Further, seizure of a property interest without notice smacks of grievous
8 oppression and obstruction of justice, invoking stringent exemplary damages,
9 particularly since Defendants have never been authorized by their employer to seize
10 any property right of Plaintiff's without just cause.

11 221. Plaintiff's interest is validated because it arises out of assisting fulfillment of the
12 mandate to first attempt private settlement, especially when expecting States to
13 conduct unbiased adjudications against their own errant state actors has a low degree
14 of trustworthiness, is a noble endeavor reflecting an honorable interest in the right.
15 This comports completely with the protected interest under the common law, entitling
16 Plaintiff to an award of damages under the presumed compensatory damages
17 principle. Interest may include 'feeling of just treatment by the government'. Interest
18 includes protecting a person from mistaken or unjustifiable deprivation of life, liberty
19 and property. Defendant's denial of due process and compelled involuntary servitude
20 (1) stripped Plaintiff of the life Plaintiff elected, which is to assist the People obtain
21 private settlements, a significant life choice, (2) stole Plaintiff's liberty through
22 coercion into the public venue or suffer being silenced, and (3) confiscated Plaintiff's
23 property interest in the notarial office for unjust enrichment via limitation of remedies
24 to state courts, eliminating remedies for the People seeking private judgments,
25 mandates exemplary damages. There can be no question that the degree of mental

1 anguish Plaintiff suffered after being deprived of the life goal which provided a sense
 2 of satisfaction and service to her country and fellow-man, constitutes irreparable harm
 3 to Plaintiff who has had to leave patrons who need her services, hanging without a
 4 remedy.

5 (5) Right to be Free from Involuntary Servitude – 13th Article in Amendment, United
 6 States Constitution

7 222. Defendants' construction of Plaintiff's contracts in the private venue as 'public'
 8 compelled Plaintiff to 'operate' in the public venue rather than 'perform' for the People
 9 in the private venue, lies as *prima facie* evidence that Defendants willingly and
 10 knowingly and maliciously used deceit, trickery, and coercion to blur the lines of
 11 demarcation between the 'People' and their 'authorized representatives' who are
 12 strictly prohibited from foraying into the private venue to direct the activities there.

13 223. Defendants knew or should have known that luring Plaintiff out of the security of
 14 Plaintiff's venue through assessing fines and penalties which require an appearance in
 15 the public venue against Plaintiff's will, constitutes involuntary servitude,
 16 notwithstanding the fact that Plaintiff's Conditional Acceptance notified Defendants
 17 that such a construction was likely.

18 224. Defendants' silence to the Conditional Acceptance with offer to cure the coercion
 19 to drag Plaintiff out of the security of the private venue through false, weak, and
 20 insufficient 'charges' without an opportunity to be heard, would have a high likelihood
 21 of inducing Plaintiff into a 'fight' which would induce Plaintiff into an argument that
 22 would be the dishonor Defendants require to establish that 'all the rules and laws go
 23 out the window when a party is in dishonor,' reflecting the maliciousness of
 24 Defendants' actions and omissions.

1 225. The subtle coercion to induce Plaintiff into a dishonor by use of threat, duress,
2 and the withholding of the office of notary, is the proximate cause of Plaintiff's
3 inability to serve the People, a damage of significant proportions since the People are
4 now deprived of a remedy which is anathema to the purpose of government officials.

5 226. Compelling Plaintiff to perform only in the public venue constitutes involuntary
6 servitude when Plaintiff demonstrated for approximately 8 years (including a previous
7 encounter with the former Secretary of State Ross Miller) that Plaintiff's intent was to
8 contract with the People in the private venue as well as with persons in the public
9 arena, in order to satisfy the tenet that 'everyone must attempt private settlement prior
10 to seeking judicial review.' Defendants acted maliciously by ignoring the opportunity
11 to cure in Plaintiff's Conditional Acceptance and leapt headlong into fines and
12 penalties against Plaintiff in a venue where Defendants lack authority of any kind.

13 227. The involuntary servitude limits and restricts Plaintiff's ability to perform as the
14 necessary bridge between the public and private venues if peace between government
15 and the People, ergo, the *raison d'être*, is to be maintained, for when the peace is
16 disturbed, the result is 'mixed war' against the People whose only remedy to obtain
17 private settlements capable of recognition in the public venue, is Plaintiff's collection
18 of personal knowledge that miscreants intended to perpetrate violations against the
19 People wronged.

20 228. An attack on one of the People, Plaintiff, is an attack on all, and when the attacker
21 is a state actor brazen enough to come into the private venue to drag or lure, without a
22 willing and knowing contractual basis, one of the People from the safety of the private
23 venue, 'mixed war' is afoot and serves as a Trojan Horse unless the federal judiciary
24 slams the door on state actors who consider clever ruses to shut down remedies
25 available to the People in the private venue. The acts of Defendants are more

1 egregious because Defendants committed the very device Plaintiff tried to ensure the
2 People had access to, i.e., the private settlement process. There are, by way of those
3 People who have not had a remedy for several months, presumed general damages as
4 well as aggravated objective and subjective bad faith awards to which Plaintiff is
5 entitled. The compensatory damages measured by the usurped fees and the cost of the
6 renewal procedures and requirements, pale when compared to the exemplary damages
7 to which Defendants need to be subjected to in order to deter future wide-reaching
8 *ultra vires* actions, for the decision in this matter will reverberate across the nation
9 where other notaries have been charged, tried, convicted, and possibly incarcerated for
10 performing perfectly legitimate acts in the private venue.

11 229. Defendants breached a duty to protect the People by foraying into the private
12 venue to constrain a notary public, Plaintiff, from serving as a bridge between the
13 public and private venues, particularly as that service pertains to obtaining private
14 judgments against corrupt state actors, of whom Defendants now join the ranks unless
15 their employer disavows their actions as *ultra vires* and investigates to uncover the
16 connection between Defendants Ricciardelli and Kania and state actors so eager to
17 please those third parties that said state actors circumvent all sense of duty and role as
18 public servants and rushed headlong into penalizing Plaintiff on behalf of RR and
19 Kania.

20 230. Intangible Constitutional interest protected by procedural due process rights raises
21 the awarding of exemplary damages for deterrence and vindication to the level of
22 provable compensatory damages. [reference treatise by Harper and Jones] and are
23 accomplished by awarding of presumed general damages.
24
25

PRAYER

231. Declaratory relief for an actual controversy that exists regarding establishing that Defendants' policies, practices, and conduct violate Plaintiff's rights under the United States Constitution and the Constitution of the State of Nevada.

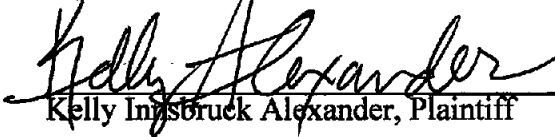
232. Injunctive relief in the form of a permanent injunction against Defendants who have 'accepted' the training and legal tender for the office, yet a real and immediate difference exists between Plaintiff and Defendants regarding Plaintiff's rights and Defendants' duty to renew the office of notary public to Plaintiff and cease withholding the authorization certificate for which Plaintiff paid and successfully completed studies to obtain. Defendants owe a duty once money has been tendered and accepted for the renewal, and Plaintiff has no adequate or speedy remedy to obtain the office which Defendants only have a right to disburse, not to pre-judge or evaluate the applicant. There are no monetary remedies available to Plaintiff since that would mean state actors could 'buy off' people the state did not want to authorize to perform the duties of a notary, and the issue is of GREAT public interest because (a) there is a mandate for all parties to attempt private settlement prior to seeking judicial review, (b) the remedy is for the People who may be unable to obtain a fair and just settlement against state actors in a state court; and (c) oppression in any form, great or small, is an offense against the People of the entire country.

233. Defendants must be permanently enjoined and restrained from foraying into the private venue with the intent to direct how private commercial affairs are conducted there, or be deemed as initiating 'mixed war' against the People of the United States. Defendants must be restrained from carrying out the policies, practices, and conduct as alleged herein as violating Plaintiff's rights under the United State Constitution and the Constitution of the State of Nevada.

- 1 234. For compensatory damages in the amount of no less than \$2,900.00;
2 235. For presumed compensatory damages in the amount of no less than \$1 million;
3 236. For nominal damages in the amount of \$5;
4 237. For exemplary damages in an amount of no less than \$2 million;
5 238. For all such costs and other expenses as the Court may direct.

DATED THIS 30th day of November, AD2018

Respectfully submitted by:

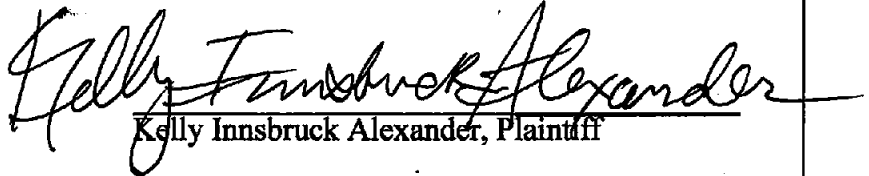
7 
8 Kelly Innsbruck Alexander, Plaintiff

10 VERIFICATION OF DECLARATORY RELIEF COMPLAINT

11 *Let Right Be Done, Though The Heavens Should Fall*

12 I, Kelly Innsbruck Alexander, Affiant, in correct public capacity as beneficiary to the Original Jurisdiction,
13 being of majority in age, competent to testify, have read the foregoing and assert that my yes be yes, my no
14 be no, and do state that the truths and facts herein are of firsthand personal knowledge, true, correct,
15 complete, certain, and not misleading, so help me God, YHWH.

16 DATED THIS 30th day of November, AD2018

17 
18 Kelly Innsbruck Alexander, Plaintiff

20 State of Nevada,
21 County of Clark
22 Signed and Sworn to (or affirmed) before me on
November 30, 2018

23 Kelly Innsbruck Alexander
Notary Public

